

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

In re:

LeClairRyan PLLC,  
  
Debtor.

Chapter 7

Case No. 19-34574 (KRH)

Lynn L. Tavenner, as Chapter 7 Trustee,  
  
Plaintiff,

v.

Adv. Proc. No. 20-03142 (KRH)

ULX Partners, LLC and UnitedLex  
Corporation,  
  
Defendants.

**AGREED STIPULATION AND ORDER**

The Parties, plaintiff Lynn L. Tavenner, as Chapter 7 Trustee (the “**Plaintiff**”) and defendants ULX Partners, LLC and UnitedLex Corporation (collectively, the “**Defendants**”), by their respective counsel, and subject to approval by the Court, stipulate and agree to the following:

1. On July 20, 2021, this Court entered an Order [Docket No. 58] requiring the Defendants to file their Answer(s) to the original Complaint [Docket No. 4] (the “**Original Complaint**”) in this matter no later than August 10, 2021 (the “**Answer Order**”).

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*Counsel for ULX Partners, LLC and UnitedLex Corporation*

2. On July 22, 2021, counsel for the Plaintiff informed the Defendants and this Court that the Plaintiff intends to file a Motion for Leave to File an Amended Complaint in this matter (the “**Anticipated Motion for Leave**”) in order for such motion to be heard by this Court at the next Omnibus Hearing of August 19, 2021.

3. In light of the Anticipated Motion for Leave, the Parties agree, subject to the Court’s approval, that the Defendants’ deadline to file their answer(s) to the Original Complaint as set forth in the Answer Order is vacated and that the following shall instead apply:

- i. In the event the Plaintiff opts against filing the Anticipated Motion for Leave, then the Plaintiff shall file a Notice of Answer Deadline with the Court indicating that Defendants will file their answer(s) to the Original Complaint no later than August 24, 2021.
- ii. In the event the Plaintiff files the Anticipated Motion for Leave and the Court denies such Motion, leaving the Original Complaint as the operative complaint in this matter, then Defendants shall file their answer(s) to the Original Complaint no later than fourteen (14) calendar days after entry of the Court’s Order denying the Anticipated Motion for Leave.
- iii. In the event the Plaintiff files the Anticipated Motion for Leave and the Court grants such Motion permitting the filing of an Amended Complaint, or if Defendants and/or their counsel consent in writing to the relief requested in the Anticipated Motion on or before August 5, 2021 (the “**Written Consent**”), then Defendants shall file (i) their answer(s) to the Amended Complaint or (ii) any other response to the Amended Complaint as permitted by the Bankruptcy Code, any rule, statute, or as otherwise authorized by the Bankruptcy Court, no later than twenty-one (21) calendar days after either the entry of the Court’s

Order granting the Anticipated Motion for Leave or the Written Consent, or by  
such other time as may be ordered by the Court.

Dated: July 30, 2021

Respectfully submitted,

/s/ Thomas J. McKee, Jr.  
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/s/ Erika L. Morabito  
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and

*Special Counsel to Plaintiff*

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*Counsel to Defendants*

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2021:

Aug 5 2021

/s/ Kevin R Huennekens  
THE HONORABLE KEVIN R. HUENNEKENS  
UNITED STATES BANKRUPTCY JUDGE

Entered On Docket: Aug 6 2021

LOCAL BANKRUPTCY RULE 9022-1(C) CERTIFICATION

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

/s/ Thomas J. McKee, Jr.

Thomas J. McKee, Jr. (VSB No. 68427)

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**Service List**

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*Counsel to Lynn L. Tavenner, Chapter 7 Trustee*

Tavener, as Chapter 7 Trustee,  
Plaintiff  
ULX Partners, LLC,  
Defendant

Adv. Proc. No. 20-03142-KRH

## CERTIFICATE OF NOTICE

District/off: 0422-7

User: baumgartn

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Date Rcvd: Aug 06, 2021

Form ID: pdford9

Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 08, 2021:

Recip ID	Recipient Name and Address
+	J. Gregory Milmo, Greenberg Traurig, LLP, One International Place, Suite 2000, Boston, MA 02110-2612

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 08, 2021

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 6, 2021 at the address(es) listed below:

Name	Email Address
Brittany Jane Nelson	on behalf of Plaintiff Lynn L. Tavener as Chapter 7 Trustee brittanynelson@quinnemanuel.com, erikamorabito@quinnemanuel.com
David G. Barger	on behalf of Defendant ULX Partners LLC bargerd@gtlaw.com, subzwaria@gtlaw.com
David G. Barger	on behalf of Defendant UnitedLex Corporation bargerd@gtlaw.com subzwaria@gtlaw.com
Erika L. Morabito	on behalf of Plaintiff Lynn L. Tavener as Chapter 7 Trustee erikamorabito@quinnemanuel.com, brittanynelson@quinnemanuel.com;haliciadraughn@quinnemanuel.com
Thomas John McKee, Jr.	on behalf of Defendant UnitedLex Corporation mckeet@gtlaw.com smedsa@gtlaw.com

District/off: 0422-7

User: baumgartn

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Date Rcvd: Aug 06, 2021

Form ID: pdford9

Total Noticed: 1

Thomas John McKee, Jr.

on behalf of Defendant ULX Partners LLC mckeet@gtlaw.com, smedsa@gtlaw.com

TOTAL: 6